

Exhibit A



Steve Wilson Briggs <snc.steve@gmail.com>

Meet and confer; ADR, etc.

Steve Wilson Briggs <snc.steve@gmail.com>
To: "Gregory P. Korn" <GKorn@kwikalaw.com>

Tue, Jan 23, 2018 at 10:09 PM

Mr. Korn,

I hope all is well.

I'm contacting you because, as I'm sure you're aware, Thursday, Jan 25th, is our deadline to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan.

As I recall, a few years ago you reached out to me to initiate that process; so, I thought I might reach out to you this time.

As far as convenient times to call...

Wednesday (1/24) my work schedule is pretty full, but I can take a call anytime between 7:30pm-9pm. If this is your preferred time, it would be nice to receive a call or text sometime in the afternoon. Or, I may be able to squeeze in a call from 3:30pm-4pm, if you're willing to shoot me a text around 3:20 to make sure I'm not in a meeting or with students.

OR

Thursday (1/25) we can talk anytime between 6:15pm and 9pm. I **may** also be able to talk between 9:15am and 10am, but would also need a text a few minutes before, in case I'm pulled into a meeting or need to support students.

You, or any of your associates, can reach me at [510 200 3763](tel:5102003763). If I can't pick up, please leave a message with a return number, and I'll get back to you as soon as possible.

Hope this helps.

Steve Wilson Briggs



Steve Wilson Briggs <snc.steve@gmail.com>

Meet and confer; ADR, etc.

Gregory P. Korn <GKorn@kwikalaw.com>

Wed, Jan 24, 2018 at 8:51 AM

To: Steve Wilson Briggs <snc.steve@gmail.com>

Cc: "Wilcox, Rochelle (rochellewilcox@dwt.com)" <rochellewilcox@dwt.com>

Mr. Briggs,

I am copying Rochelle Wilcox, who represents NBC Universal.

I wasn't aware we had a Jan. 25 deadline. I haven't seen the issuance of an order setting a scheduling conference that would then require us to meet and confer under Rule 26. If you're referring to an order that was issued when Magistrate Judge Beeler had the case, I don't believe that's applicable.

Rochelle, what's your take on this?

Note that I'm in deposition today and won't be accessible most of the day.

Regards,

Greg

Gregory P. Korn | **Kinsella Weitzman Iser Kump & Aldisert LLP**

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From: Steve Wilson Briggs [mailto:snc.steve@gmail.com]

Sent: Tuesday, January 23, 2018 10:09 PM

To: Gregory P. Korn

Subject: Meet and confer; ADR, etc.

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Steve Wilson Briggs <snc.steve@gmail.com>

Meet and confer; ADR, etc.

Charney, Brendan <BrendanCharney@dwt.com>

Wed, Jan 24, 2018 at 4:55 PM

To: "snc.steve@gmail.com" <snc.steve@gmail.com>

Cc: "Wilcox, Rochelle" <rochellewilcox@dwt.com>, "gkorn@kwikalaw.com" <gkorn@kwikalaw.com>

Mr. Briggs,

Thank you for your message. We also had not received an order by Judge Chhabria setting a CMC—although we now understand from reviewing the docket that a CMC is set for February 13.

As you may have seen, Judge Chhabria's Civil Standing Order provides that, "If a dispositive motion to dismiss is filed, the parties can stipulate to move the initial case management conference to 12 days after the hearing on that motion."

Given the upcoming February 22 hearing on defendants' motions to dismiss, we propose stipulating to move the CMC to March 6. Do you have any objection to doing so? If not, we will prepare a joint stipulation for your review.

Regards,

Brendan

Brendan Charney | Davis Wright Tremaine LLP

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From: Gregory P. Korn [<mailto:GKorn@kwikalaw.com>]

Sent: Wednesday, January 24, 2018 8:51 AM

To: Steve Wilson Briggs

Cc: Wilcox, Rochelle

Subject: RE: Meet and confer; ADR, etc.

[Quoted text hidden]



Steve Wilson Briggs <snc.steve@gmail.com>

Meet and confer; ADR, etc.

Steve Wilson Briggs <snc.steve@gmail.com>

Wed, Jan 24, 2018 at 11:39 PM

To: "Charney, Brendan" <BrendanCharney@dwt.com>

Cc: "Wilcox, Rochelle" <rochellewilcox@dwt.com>, "gkorn@kwikalaw.com" <gkorn@kwikalaw.com>

Mr. Korn, Mr. Charney, and Ms Wilcox,

I think we may be talking about different deadlines, and we also may have different understandings of certain central dates. My initial email was just an effort to adhere to the Case Schedule - Multi-Option Program event schedule, from the Order Setting Initial Case Management Conference And ADR Deadline. Page 2 of that order set Jan 25th as the last day to meet and confer about ADR, initial disclosures, early settlement, discovery plan, etc. I've attached the first two pages of that order, for your convenience.

If this is correct, you have my phone number and times I can talk, Thursday, if you'd like.

I think Mr. Charney's dates may be a bit off, as he suggested the docket indicated the CMC was set for Feb 13th. I still have the understanding that the CMC is set for Feb 15th.

Although I hate being disagreeable, I don't agree to moving the CMC to March 6th. So please do not prepare that stipulation.

If somehow I was mistaken about any of the Jan 25th meet and confer deadline info, my apologies.

Thanks

Steve Wilson Briggs

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 **first 2 pages ICMC order.pdf**
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